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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

All Actions

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF ANNE B. SHAVER IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PLAINTIFFS' REPLY IN
SUPPORT OF SUPPLEMENTAL CLASS
CERTIFICATION MOTION**

Date: August 8, 2013
Time: 1:30 pm
Courtroom: 8, 4th Floor
Judge: Honorable Lucy H. Koh

I, Anne B. Shaver, declare:

1. I am an associate in the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP, a member of the State Bar of California, and am admitted to practice before the United States

1 District Court for the Northern District of California. I am one of the counsel for the Plaintiffs in
2 this action. I make this declaration based on my own personal knowledge. If called upon to
3 testify, I could and would testify competently to the truth of the matters stated herein.

4 2. Plaintiffs seek permission to file under seal portions of:

5 (a) Portions of Plaintiffs' Reply In Support Of Supplemental Motion for Class
6 Certification;

7 (b) Portions of Expert Report of Edward E. Leamer, Ph.D.;

8 (c) Exhibits A through O and Plaintiffs' Deposition Exhibits 122, 1304, 2738,
9 and 2739, attached to the Declaration of Anne B. Shaver in Support of Plaintiffs' Supplemental
10 Motion for Class Certification; and

11 (d) Declaration of Sheryl Sandberg.

12 3. Designated portions of the documents referenced in paragraphs 1 and 2 refer to
13 documents or information that Defendants or Plaintiffs have designated "CONFIDENTIAL" or
14 "CONFIDENTIAL – ATTORNEYS' EYES ONLY" under the Stipulated Protective Order
15 (Modified by the Court) (Dkt. No. 107).

16 4. Plaintiffs further seek permission to file under seal the following documents in
17 their entirety:

18 (a) Exhibits A through O and Plaintiffs' Deposition Exhibits 122, 1304, 2738,
19 and 2739, attached to the Declaration of Anne B. Shaver in Support of Plaintiffs' Supplemental
20 Motion for Class Certification; and

21 (b) Declaration of Sheryl Sandberg.

22 5. The documents referenced in paragraph 4 have been designated
23 "CONFIDENTIAL" or "CONFIDENTIAL – ATTORNEYS' EYES ONLY" by Defendants, a
24 Third Party, or Plaintiffs under the Stipulated Protective Order (Modified by the Court) (Dkt. No.
25 107).

26 6. Defendants have confirmed that all documents produced by Defendants in this
27 litigation that are designated "CONFIDENTIAL" or "CONFIDENTIAL-ATTORNEYS' EYES
28 ONLY" should be filed under seal.

7. Counsel for third party Sheryl Sandberg have confirmed that the Declaration of Sheryl Sandberg is designated “CONFIDENTIAL” or “CONFIDENTIAL-ATTORNEYS’ EYES ONLY” and should be filed under seal.

* * *

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed July 12, 2013 in San Francisco, California.

/s/ Anne B. Shaver

Anne B. Shaver